



Maryland Department of Planning
Maryland Historical Trust

Martin O'Malley
Governor

Anthony G. Brown
Lt. Governor

Richard Eberhart Hall
Secretary

Matthew J. Power
Deputy Secretary

January 16, 2013

B.M. Vogel
Commander, U.S. Navy
Public Works Officer, Naval Support Activity Bethesda
8901 Wisconsin Avenue, Bldg. 14
Bethesda, MD 20889-5600

Re: DEIS for the Medical Facilities Development and University Expansion
Naval Support Activity Bethesda
Bethesda, Maryland

Dear Commander Vogel:

The Maryland Historical Trust (Trust), the State's Historic Preservation Office, received notice of the above-referenced undertakings on December 17, 2012. We are writing to offer our comments necessary to evaluate the undertakings' effects on historic properties in accordance with Section 106 of the National Historic Preservation Act.

According to the materials provided, the Navy is planning an Environmental Impact Statement (EIS) to cover multiple undertakings at Naval Support Activity Bethesda, as identified in Attachment 1. Many of the undertakings identified in the EIS are within the National Naval Medical Center Historic District (Maryland Inventory of Historic Properties number M: 35-98). The National Naval Medical Center Historic District is eligible for listing on the National Register of Historic Places. Those undertakings that are within the Historic District boundary must conform to the *Secretary of the Interior's Standards for the Treatment of Historic Properties* in order to avoid an "adverse effect" on historic properties.

The proposed undertaking that the Trust is most alarmed about is the underground parking structure planned for the front lawn. The lawn, terrace and monumental flagpole are Paul Cret-designed landscape features that retain a high degree of integrity. This significant designed landscape in front of Building 1 is a contributing feature of the historic district and should be treated as such. The demolition of these features and the construction of an underground parking structure beneath the front lawn would constitute an **adverse effect** on historic properties.

The implementing regulations for Section 106 of the National Historic Preservation Act, 36 CFR § 800, require the Navy to develop and evaluate alternative plans that avoid, minimize, or mitigate the adverse effects of the undertaking. We recommend that Navy select one of the identified alternative locations for the parking garage that will avoid the historic structures and design the new structure in a manner consistent with the *Secretary of the Interior's Standards for the Treatment of Historic Properties*.

We look forward to working with the Navy to successfully complete the project's historic preservation review, as appropriate. If you have questions or require further assistance, please contact Amanda Apple at 410-514-7630 or aapple@mdp.state.md.us. Thank you for providing us this opportunity to comment.

Sincerely,

J. Rodney Little
Director / State Historic Preservation Officer
Maryland Historical Trust

JRL/ARA/201206818

CC: Jeffrey Hinkle (NCPC)

Louis Brodnitz (ACHP)

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Attachment 1

Undertaking	Effect Determination
H-Lot Parking Garage Alternative	No Effect
Taylor Road Parking Garage Alternative	No Adverse Effect*
Warehouse Parking Garage Alternative	Until the buildings have been evaluated for the National Register no effect determination can be made at this time.
Utilities Capacity and Infrastructure	No Adverse Effect
Temporary Medical Facilities	No Adverse Effect
Interior Renovations to Buildings 1, 3, 5, 9, and 10	No Adverse Effect*
North Palmer Rd. Pathways	No Adverse Effect*
Courtyard R.B Brown Drive	No Adverse Effect
Memorial Grove	No Adverse Effect
Building 17 Connector	No Adverse Effect*
University Entry	No Effect
Stoney Creek Trail System	No Adverse Effect
University Expansion Alternative 1	No Effect
University Expansion Alternative	No Effect

* With the understanding that continued consultation with the MD SHPO during design will be required to avoid adverse effects to historic properties.